

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: June 4, 1985

THRU: James Mattes *JMM*

TO: Terry F. Gray, Chief
Plan Review and Permit Section

FROM: Maggi M. Mogollon *JMM*
Plan Review and Permit Section

SUBJECT: Bendix, Franklin, Indiana
IND 044587848

EPA Region 5 Records Ctr.



287270

On May 28, 1985, I spoke with Mr. Hak Cho, U.S. EPA, Region V, regarding the above-referenced facility.

I explained that the facility has had leaks in the plating room floor which is the probable source of the groundwater contamination and told him of your suggestion to call in their Part B permit in order to begin considering a facility management plan. Mr. Cho said he feels that the Part B call-in would not be appropriate for this facility because they are no longer active and the situation does not fall into the National Permit Strategy, the RCRA Implementation Plan Strategy, etc.

He suggests that the State use its authorized enforcement mechanisms to implement a RCRA interim status corrective action. He says the Part B does not need to be called in to start the facility management plan under authorized State enforcement activities and that a State agency can send a corrective action response requirement letter in lieu of the EPA. This could be the basis for the enforcement action. The NOV could then incorporate a date for submittal of a closure plan and a compliance schedule. He said that a facility may be in violation of several acts at one time and cleanup under one act does not relinquish or supersede obligations of returning to compliance with another.

I called Mr. Pat Haynes on the same date. He said disposals from this facility were determined to fall under the generic approval for Adams Center Landfill. He will have Ms. Susan Griggs of Adams Center Landfill send us a copy of the waste evaluation worksheet.

MJM/sk

7/07M
E/3/85